

REPORT 120 FEDERAL TELECTION COLLABORISM

2012 JUL 10 PH 4: 14

OFFICE OF HEREIGAL COURSEL

July 10, 2012

Via Facsimile (202) 219-3923 and U.S. Mail

Office of General Counsel Federal Election Commission Attn: Jeff S. Jordan, Esq. 999 E. Street N.W. Washington, D.C. 20463

RE: MUR 6469.

Response of Turkish Coalition of America to Complainant's Second Amendment

Dear Mr. Jordan:

On July 5, 2012 Respondent Turkish Coalition of America ("TCA") received a June 21, 2012 letter from the FEC attaching a second amendment to the Complaint. TCA hereby responds.

Complainant's latest amendment adds nothing to the record concerning the actions or motivations of TCA, and is primarily directed at Rep. Schmidt. Therefore, the validity and force of the arguments made by TCA in its initial response, dated September 26, 2011, are not diminished by the amendment and need not be restored at length time. TCA emphasizes that it did not give a gift or anything of value for the purpose of influencing an election for federal office because at the time Rep. Schmidt sought representation by TALDF (the legal defense fund created by TCA), the election cycle was over. And, the legal services TALDF provided Rep. Schmidt in 2009 before the Ohio Elections Commission, the Ohio Court of Common Pleas on appeal, and the United States District Courts for the Northern and Southern Districts of Ohio all were provided when she was <u>not</u> a candidate for federal office. A minor portion of TALDF's Turkish Coalition of America

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legal services were provided in 2010, and then only relating to Rep. Schmidt's defamation suit against Mr. Krikorian in the Ohio Court of Common Pleas, Clermont County. TALDF later withdrew from that representation. At all times TALDF lawyers understood that they were hired irrespective of any future candidacy for office by Jean Schmidt, and certainly not to support any prior candidacy.

Respectfully submitted,

David Saltzman Attorney for TCA

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## **Turkish Coalition of America**

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